

Jasmine Ball
Maura Kathleen Monaghan
Jeffrey J. Rosen
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-6000
Facsimile: (212) 909-6836

Attorneys for Beacon Company

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)
(Jointly Administered)**

**THE MORTIMER D. SACKLER FAMILY’S MOTION FOR
LEAVE TO EXCEED PAGE LIMIT IN FILING THEIR RESPONSE
TO PLAN OBJECTIONS AND STATEMENT IN SUPPORT OF CONFIRMATION
OF THE SIXTH AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION
OF PURDUE PHARMA L.P. AND ITS AFFILIATED DEBTORS**

The Dr. Mortimer Sackler Initial Covered Sackler Persons (“**Side A ICSPs**”),² by and through their undersigned counsel, hereby submit this motion (the “**Motion**”) for leave to exceed

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² The Mortimer Sackler ICSPs include Theresa Sackler, Ilene Sackler Lefcourt, Kathe Sackler, and Mortimer D.A. Sackler, as well as trusts for their benefit and the trustees of those trusts. Amended and Restated Case Stipulation Among the Debtors, the Official Committee of Unsecured Creditors and Certain Related Parties dated Nov. 20, 2019 ¶ 1, *In re Purdue Pharma L.P.* (Bankr. S.D.N.Y. Nov. 20, 2019), ECF No. 518.

this Bankruptcy Court’s page limitations when filing their Response to Plan Objections and Statement in Support of Confirmation of the Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors (the “**Response**”). The Side A ICSPs respectfully state as follows:

1. The Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures [D.I. 498] (the “**Case Management Order**”), provides that “replies and statements are limited to 20 pages.”

2. To date, dozens of parties have filed substantial objections to the Sixth Amended Plan of Reorganization, totaling hundreds of pages of briefing. *See, e.g.*, Objection of the United States Trustee to Sixth Amended Joint Chapter 11 Plan of Purdue Pharma L.P. and its Affiliated Debtors [D.I. 3256]; Joint Objection to Confirmation of Plan of the State of Connecticut, State of Maryland and District of Columbia [D.I. 3270]; Objection to Confirmation of Plan of the State of Washington, the State of Oregon, and the Objecting States [D.I. 3276].

3. To effectively address the concerns of a broad range of parties on an equally expansive range of topics, the Side A ICSPs required more than the twenty pages permitted for a reply by the Case Management Order. Specifically, the length of the Response is sixty-five (65) pages, exclusive of the title page, table of contents, table of authorities, and signature pages.

4. In drafting their Response, the Side A ICSPs have endeavored to be as concise as possible in addressing both (i) why the Shareholder Releases are appropriate under applicable caselaw and (ii) the challenges that claimants would with respect to both the merits and judgment enforcement were to resume.

5. The Side A ICSPs have also obtained the consent of the Debtors.

6. For the above reasons, the Side A ICSPs respectfully request that this Court grant them leave to file the Response, filed simultaneously with this Motion.

Dated: August 5, 2021
New York, New York

By: /s/ Jasmine Ball
Jasmine Ball
Maura Kathleen Monaghan
Jeffrey J. Rosen
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-6000
Facsimile: (212) 909-6836
Email: jball@debevoise.com
mkmonaghan@debevoise.com
jrosen@debevoise.com

Attorneys for Beacon Company